

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE’S SUR-
REPLY TO PLAINTIFF TQ DELTA’S MOTION TO STRIKE PORTIONS OF THE
NON-INFRINGEMENT REPORT AND OPINIONS OF DEFENDANTS’ EXPERT,
DR. NAOFAL AL-DHAHIR**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, “CommScope”). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. Executed on
January 25, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong